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RAFAEL ROBLES*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

MEGAN TRAMA, MATTHEW
HARTZ, and RAFAEL ROBLES on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RELX INC.

Defendant.

Case No. 2:24-cv-3174-DSF (Ex)

Judicial Officer: Hon. Dale S. Fischer

**PLAINTIFFS' NOTICE OF
MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

Date: November 3, 2025

Time: 1:30 p.m.

Courtroom: 7D

TO THE COURT, ALL PARTIES, AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on November 3, 2025 at 1:30 p.m., or as soon as this matter may be heard, Plaintiffs Megan Trama, Matthew Hartz, and Rafael Robles, on behalf of themselves and all others similarly situated (“Plaintiffs”), respectfully move this Court for preliminary approval of the settlement reached in this case, the terms of which Plaintiffs describe in the Memorandum of Points and Authority in support of this Motion. This Motion will be heard before the Honorable Dale S. Fischer of the above-named Court. The Court is located at the First Street Courthouse, 350 West 1st Street, Courtroom 7D, Los Angeles, California 90012.

Plaintiffs request that the Court enter the proposed Preliminary Approval Order and: (1) conditionally certify the Settlement Class (as defined in the settlement agreement) under Federal Rule of Civil Procedure 23(b)(2); (2) appoint Plaintiffs’ counsel as class counsel for purposes of the settlement; (3) preliminarily approve the settlement agreement; and (4) schedule a Final Approval Hearing.

This Motion is based on the Notice of Motion, the accompanying Memorandum of Points and Authorities, the Settlement Agreement (Ex. 1), the Declaration of Krysta Pachman (Ex. 2), the pleadings, records, and other filings in the case, and other such matters and argument as the Court may consider at the hearing of this Motion.

Pursuant to L.R. 7-3, this Motion is unopposed and is filed with the consent of counsel for Defendant RELX, Inc.

1 Dated: October 6, 2025

Respectfully submitted,

2 By: /s/ Krysta Kauble Pachman

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